

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA

v.

1:25-MJ-206

ROBERT MELLUSI,

*Defendant.*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Maureen O' Callahan, being duly sworn, state the following:

1. I am a Ranger with the United States Department of the Interior, National Park Service (NPS). As a Ranger with NPS, I have received specialized training and have conducted numerous investigations relating to violations of the Virginia Code, the Code of Federal Regulations, and Title 18 of the United States Code.

2. My duties as an NPS Ranger include investigating criminal violations of the Virginia Code, Code of Federal Regulations, and Title 18 of the United States Code, and, as warranted, seeking prosecution of offenders.

3. This affidavit is submitted in support of a criminal complaint charging that on or about December 2, 2024, in Manassas National Battlefield Park, within the special maritime and territorial jurisdiction of the United States, in the Eastern District of Virginia, ROBERT N. MELLUSI, having received a visible or audible signal from a law-enforcement officer to bring his motor vehicle to a stop, drove such motor vehicle in a willful and wanton disregard of such signal so as to interfere with or endanger the operation of the law-enforcement vehicle or endanger a person, in violation of Title 18, United States Code, Section 13, assimilating Code of Virginia Section 46.2-817(b).

4. The facts and information contained in this affidavit are based upon my training and experience, personal knowledge, and observations during the course of this investigation. This affidavit contains information necessary to support probable cause, but it is not intended to include each, and every, fact and matter observed by me or known to the United States.

**SUMMARY OF FACTS TO SUPPORT PROBABLE CAUSE**

5. On or about December 2, 2024, I attempted to effectuate a traffic stop of a sedan that illegally passed another vehicle in my area of patrol within Manassas National Battlefield Park. While enroute, I encountered a green Ford F-150 pickup truck, bearing New Jersey license plate U50-PXJ. The driver of the truck made no effort to slow-down or pull over to allow me to pass, despite me activating the overhead patrol lights of my marked police cruiser, and despite my having activated my patrol car's siren on multiple occasions. I moved to the left side of the narrow road and pulled-up next to the pick-up truck to indicate that I expected the driver of the pickup truck to allow me to pass. At that point, the driver turned his head and looked directly at me several times as we drove along a .5 mile stretch of the road. Instead of allowing me to pass, the driver shifted further to the left to prevent me from passing. This behavior caused me to focus on pursuing the pickup truck rather than the other vehicle I originally intended to pursue.

6. At that point, I fell-in behind the pickup truck and reactivated my police siren as my signal to indicate that I expected the driver to bring his motor vehicle to a stop. Notwithstanding the audible signal, the driver continued without stopping. During the approximately 11-minute pursuit of the pickup truck, I witnessed the driver navigate around multiple vehicles in an illegal fashion at least three different times, make numerous illegal turns to include two illegal U-turns, run at least three red lights without stopping, drive on the wrong side

of the road, and drive down a two-lane highway towards oncoming traffic, which forced multiple vehicles to drive off the road.

7. I radioed Prince William County Department of Public Safety Communications Dispatch to request assistance with the pursuit. As a result, the Prince William County Dispatch ran the New Jersey tags and identified the registered owner as MELLUSI who was the subject of a New Jersey in-state only arrest warrant. After failing to receive assistance with stopping the vehicle, and after consultation with my supervisor, I terminated pursuit of MELLUSI.

8. In comparing my recollection of the driver of the pickup truck, whom I observed first-hand during the pursuit, with MELLUSI's New Jersey driver's license picture, I am confident that the driver of the pickup truck that I pursued on December 2, 2024 was indeed MELLUSI.

9. I issued five misdemeanor citations to MELLUSI for his offenses, which included Reckless Driving, Disregarding Signal by Law Enforcement to Stop/Eluding Police, Aggressive Driving, Threatening, Resisting, Intimidating, or Intentionally interfering with Government Employee, and Creating or Maintaining a Hazard or Offensive Condition. A warrant was issued for MELLUSI following his failure to appear before this Court on 23 January 2025 to address the five misdemeanor citations.

### **CONCLUSION**

10. Based on the foregoing, I submit there is probable cause to believe that on or about December 2, 2024, in Manassas National Battlefield Park, within the special maritime and territorial jurisdiction of the United States, in the Eastern District of Virginia, Robert N. MELLUSI, having received a visible or audible signal from a law-enforcement officer to bring his motor vehicle to a stop, drove such motor vehicle in a willful and wanton disregard of such signal so as to interfere with or endanger the operation of the law-enforcement vehicle or endanger a

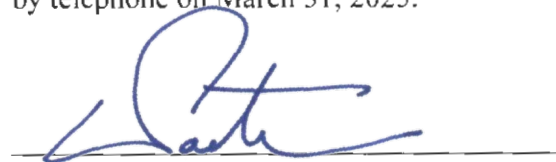
person, in violation of Title 18, United States Code, Section 13, assimilating Code of Virginia Section 46.2-817(b).

Respectfully submitted,



Ranger Maureen O' Callahan  
National Park Service

Attested to by the applicant in accordance  
with the requirements of Fed. R. Crim. P. 4.1  
by telephone on March 31, 2025.



Honorable William B. Porter  
United States Magistrate Judge